

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

COGNIZANT TRIZETTO SOFTWARE
GROUP, INC.,

Plaintiff,

v.

INFOSYS LIMITED,

Defendant.

Case No. 3:24-cv-02158-X

The Honorable Brantley Starr

INFOSYS LIMITED,

Counterclaim Plaintiff,

v.

COGNIZANT TECHNOLOGY
SOLUTIONS CORP. and COGNIZANT
TRIZETTO SOFTWARE GROUP, INC.,

Counterclaim Defendants.

**[PROPOSED] ORDER GRANTING INFOSYS LIMITED’S MOTION
(1) TO COMPEL PROPER TRADE SECRET IDENTIFICATION AND
(2) FOR PROTECTIVE ORDER SEQUENCING DISCOVERY
DEPENDENT ON THE IDENTITY OF THE TRADE SECRETS AT ISSUE**

This matter came before the Court on Defendant Infosys Limited’s Motion (1) to Compel Proper Trade Secret Identification and (2) for Protective Order Sequencing Discovery Dependent on the Identity of the Trade Secrets at Issue.

Having considered Infosys’s Motion and supporting materials, Cognizant’s opposition to the motion (if any), and all of the files, records, and proceedings herein, **IT IS HEREBY ORDERED** that Infosys’s Motion is **GRANTED** as follows:

1. Cognizant shall amend its response to Infosys's Interrogatory No. 1 in the form of a list that separately breaks out each individual trade secret that Cognizant contends Infosys misappropriated and explains how the claimed trade secret is unique from information found in the public domain or generally known within the industry;
2. Infosys's objections to Cognizant's First Sets of Interrogatories and Requests for Production are sustained to the extent they object to responding to trade secret discovery on the ground that Cognizant has not yet identified the trade secrets at issue with reasonable particularity; and
3. Infosys shall serve amended responses and objections to Cognizant's First Sets of Interrogatories and Requests for Production within 30 days after Cognizant identifies, with reasonable particularity, the trade secrets it contends Infosys misappropriated.

IT IS SO ORDERED.

Dated this _____ day of _____, 2025

David L. Horan
United States Magistrate Judge